UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	CR. NO. 05 - 10010
V.	
JOHN MONTONI, et al.,	

MOTION TO MODIFY TRAVEL CONDITIONS

Now comes the defendant, John Montoni, in the above – captioned matter and respectfully requests that this Honorable Court permanently modify his conditions of travel so that may accompany his son, Shane, to a football camp at Milford Academy, New Berlin, New York. Pretrial case supervisor September – Lee Brown has been notified and has no opposition to this motion.

Respectfully submitted, John Montoni, By his attorney,

/s/ Neil F. Faigel
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Date: July 14, 2005